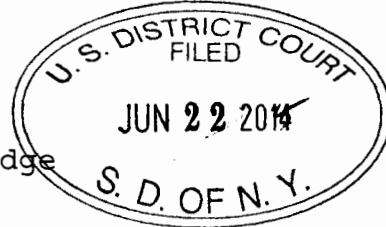


ORIGINAL

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Approved: ALEX ROSSMILLER
Assistant United States Attorney

Before: HONORABLE FRANK MAAS
United States Chief Magistrate Judge
Southern District of New York



DOC #

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	:	<u>SEALED COMPLAINT</u>
UNITED STATES OF AMERICA	:	
	:	Violation of
- v. -	:	21 U.S.C. § 846
	:	
LONG CHEN,	:	COUNTY OF OFFENSE:
	:	NEW YORK
Defendant.	:	
	:	
- - - - -	x	
SOUTHERN DISTRICT OF NEW YORK, ss.:		

WILLIAM ANDERSON, being duly sworn, deposes and says that he is a Special Agent with Homeland Security Investigations ("HSI"), and charges as follows:

COUNT ONE

1. In or about June 2015, in the Southern District of New York and elsewhere, LONG CHEN, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree, together and with each other, to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that LONG CHENG, the defendant, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that LONG CHENG, the defendant, conspired to distribute and possess with the intent to distribute was 50 kilograms and more of mixtures and substances containing a detectible amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

4. I am a special agent with HSI, and I have been involved in the investigation of the above-described offense. I am familiar with the facts and circumstances set forth below from my personal participation in the investigation, including my review of pertinent documents, and from my conversations with fellow law enforcement officers. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

5. From my participation in this investigation, I have learned, among other things, that:

a. Since at least in or about December 2013, HSI has been investigating a narcotics trafficking organization that traffics in marijuana in multiple states, including in the Southern District of New York and elsewhere.

b. During the course of that investigation, a confidential source ("CS-1")¹ has been working with the DEA. Pursuant to the investigation, CS-1 placed phone calls at the direction of law enforcement originating from New York, New York, to members of the drug trafficking organization, including to LONG CHEN, the defendant, to discuss marijuana trafficking transactions. CS-1 also received phone calls from members of the drug trafficking organization while CS-1 was located in New York, New York.

c. Pursuant to that investigation, HSI has been investigating LONG CHEN, the defendant.

d. On or about June 19, 2015, law enforcement agents conducted surveillance of LONG CHEN, the defendant, at a location in Seattle, Washington (the "Location"). During the surveillance, law enforcement agents observed CHEN loading large bags or suitcases (the "Suitcases") into a residential vehicle (the "RV") with Massachusetts license plates. CHEN then drove

¹ CS-1 has been cooperating with the DEA for approximately one month. Information provided by CS-1 has been shown to be reliable and corroborated by, among other things, phone calls monitored by law enforcement.

away from the Location in the RV.

e. On or about June 19, 2015, shortly after the RV drove away from the Location, officers with the Oregon Bureau of Police conducted a traffic stop of the RV.

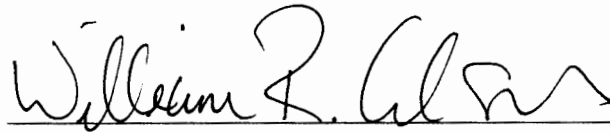
f. During the traffic stop, LONG CHEN, the defendant, was asked for identification. CHEN stated that he did not have a driver's license. Subsequently, a police K-9 canine unit certified in narcotics detection was taken to the RV for exterior inspection and review of the RV. The canine alerted on a compartment of the RV, a reaction indicating a positive alert for the presence of controlled substances.

g. Officers with the Oregon Bureau of Police observed, in storage and the passenger compartments of the RV, the Suitcases. Subsequently a search warrant and seizure order was issued in the State of Oregon, County of Multnomah, by Magistrate John A. Wittmayer, for the Suitcases. A search of the Suitcases was conducted and revealed individually wrapped packages of what law enforcement agents believed, based on training and experience, to be a quantity of mixtures and substances containing marijuana. After seizing the packages of what appeared to be marijuana, law enforcement weighed the packages, which totaled approximately 150 lbs.

h. LONG CHEN, the defendant, was detained by law enforcement officers and was advised of his *Miranda* rights orally and in writing. CHEN waived his rights, and initially said that he was on vacation. Following additional questioning, CHEN acknowledged that he had traveled from Massachusetts to Washington to pick up marijuana for subsequent sale.

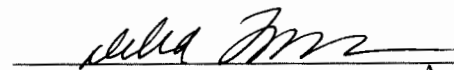
i. LONG CHEN, the defendant, subsequently was placed under arrest.

WHEREFORE, the deponent respectfully requests that LONG CHEN, the defendant, be imprisoned or bailed, as the case may be.



WILLIAM ANDERSON
Special Agent
Homeland Security Investigations

Sworn to before me this
22nd day of June 2015


~~HONORABLE FRANK MAAS~~ DEBRA FREEMAN
United States ~~Chief~~ Magistrate Judge
Southern District of New York